

**REQUIRED STATEMENT TO ACCOMPANY
ALL MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor Ira L. Fenton Case No. 20-13999 Chapter 13

All Cases: Moving Creditor Towd Point Mortgage Trust 2015-3, U.S. Bank National
Association as Indenture Trustee Date Case Filed: 7/16/2020

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (Describe) _____

Chapter 13: Date of Confirmation Hearing 9/03/2020 or Date Plan Confirmed _____

Chapter 7: No Asset Report Filed on _____

No Asset Report not Filed, Date of Creditors Meeting _____

1. Collateral
- a. ☐ Home ☒ Real Property
- b. ☐ Car Year, Make, and Model _____
- c. ☐ Other (describe) _____

2 Balance Owed as of July 22, 2020 \$165,027.96 _____

Total of all other liens against Collateral \$40,000.00 _____

3 In chapter 13 cases, attach a payment history listing the amounts and dates of all payments received from the Debtor post-petition. _____

4 Estimated Value of Collateral (must be supplied in all cases) \$164,000.00 _____

5. Default

a. ☒ Pre-Petition Default

Number of Months 15 Amount: \$28,379.12

b. ☐ Post-Petition Default

i. ☐ On Direct Payments to the Moving Creditor

Number of Months _____ Amount N/A – Debtor Surrendering Property

ii. ☐ On Payments to the Standing Chapter 13 Trustee

Number of Months _____ Amount _____

6. Other Allegations
- a. ☒ Lack of Adequate Protection §362(d)(1)
- i. ☐ No Insurance
- ii. ☐ Taxes Unpaid Amount _____
- iii. ☐ Rapidly Depreciating Asset
- iv. ☐ Other (describe) _____
- b. ☒ No Equity and not Necessary for an Effective Reorganization §362(d)(2)
- c. ☐ Other “Cause” §362(d)(1)
- i. ☐ Bad Faith (describe) _____
- ii. ☐ Multiple Filings
- iii. ☐ Other (describe) _____
- d. Debtor’s Statement of Intention Regarding the Collateral
- i. ☐ Reaffirm ii. ☐ Redeem
- iii. ☒ Surrender iv. ☐ No Statement of Intention Filed
- v. ☐ Not Listed on Statement of Intention Filed

Date: 08/03/2020

/s/ Matthew C. Abad